

**IN THE UNITED STATES COURT OF FEDERAL CLAIMS**

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MYNETTE TECHNOLOGIES, INC.  
and STEVEN M. COLBY,

Plaintiffs,

v.

THE UNITED STATES,

Defendant,

and

GEMALTO, INC. and IDEMIA IDENTITY  
& SECURITY USA LLC,

Intervenor-Defendants.

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Case No. 16-cv-01647-RTH

Judge Ryan T. Holte

**JOINT MOTION FOR ENLARGEMENT OF TIME TO FILE JOINT SUBMISSIONS**

WHEREAS, on December 5, 2022, the Court issued an Opinion and Order granting-in-part Defendants' Motion for Sanctions. (ECF No. 153)

WHEREAS, in the Opinion and Order, the Court ordered the parties to jointly (i) submit via email to the Court proposed redactions, if any, by December 12, 2022 at 5:00PM ET, (ii) file a motion to vacate the Court's protective order (ECF No. 74) by December 19, 2022, (iii) file a stipulated amended protective order including a covenant not to sue consistent with the Opinion and Order by December 19, 2022, and (iv) file a joint status report proposing a timeline for further proceedings consistent with the Court's Opinion and Order by January 4, 2023.

WHEREAS, on December 12, 2022, Plaintiffs filed an unopposed motion to enlarge the time for filing the Joint Submission on redactions by seven (7) days to December 19, 2022, and the Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Order containing a covenant not to sue by two (2) days to December 21, 2022. The Court granted this motion for enlargement of time.

WHEREAS, on December 21, 2022, the parties jointly requested an enlargement of time, up to and including December 30, 2022, to file a Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Ordering containing a covenant not to sue. The Court granted this motion for enlargement of time.

WHEREAS, the parties now jointly request a one-week enlargement of time, up to and including January 6, 2023, to file a Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Order containing a covenant not to sue, and jointly request a one-week enlargement of time, up to and including January 11, 2023, to file a joint status report proposing a timeline for further proceedings. This is Plaintiffs' third request and Defendants' second request for an enlargement of time of the date to file a Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Order. This is the parties' first request for an enlargement of time of the date to file the joint status report required by the Court's Opinion and Order.

WHEREAS, the parties jointly make this request because the parties are continuing to negotiate the proposed covenant and believe that more time would potentially allow the parties to reach agreement or otherwise narrow the issues.

THEREFORE, Plaintiffs, Defendant, and Third Party Defendants respectfully request that the Court grant their joint request for an enlargement of time. With this enlargement, the deadline for the Joint Motion to Vacate the Protective Order and Stipulated Amended Protective Ordering

containing a covenant not to sue will be January 6, 2023, and the deadline for joint status report proposing a timeline for further proceedings will be January 11, 2023.

Respectfully submitted,

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December 30, 2022

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December 30, 2022

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December 30, 2022